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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

PAUL CARLOS RAMIREZ,

Defendant.

2:15-mj-00467-CWH

STIPULATION TO CONTINUE
TRIAL (1st REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel for the United States of America, and Sean Sullivan, Esq., counsel for defendant **PAUL CARLOS RAMIREZ** that the trial date currently set for Wednesday, September 8, 2015 at 9:00 a.m., be vacated and continued for thirty (30) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

1. The parties are in the process of negotiating a resolution of the case that would obviate the need for trial and need additional time to do so.

2. The Defendant is not in custody and agrees to the continuance.

3. Denial of this request for a trial continuance would prejudice both the Defendants and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation, is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and § 3161(h)(8)(A), considering the factors under 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

6. There have been no previous requests for a continuance of the trial in this case.

DATED this 8th day of September, 2015.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney

/s/ Sean P. Sullivan

By: _____

Sean P. Sullivan, Esq.
Counsel for the Defendant
PAUL CARLOS RAMIREZ

/s/ Nadia Ahmed

By: _____

Nadia Ahmed
Special Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

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Defendant.

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ORDER CONTINUING TRIAL

Based on the pending stipulation of counsel, and good cause appearing therefore, the court hereby finds that:

IT IS HEREBY ORDERED that the deadline to continue the trial, currently scheduled for September 8, 2015, at the hour of 9:00 a.m., is continued to October 14, 2015 at 9:00 a.m.

DATED: September 8, 2015


UNITED STATES MAGISTRATE JUDGE